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Subject: Portland Harbor BSAF
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Eric –

I did not find EPA's 8 August 2008 comments on Appendix E of the Round 2 Report, but I found LWG's 3 October 2008 responses, which repeat EPA's comments. We apparently did not say explicitly that they needed to calculate BSAFs for the chemicals used in the FWM, but it might be implied.

- Mike

14. Section 2.0 – Biota-Sediment Relationship Development:

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EPA's independent review of the BSAFs across the site suggest that BSAFs may vary spatially across the site. Further evaluation of BSAF trends may prove useful in developing location specific BSAFs or developing additional normalization techniques that may reduce the uncertainty in BSAF estimates.

In general, the BSAFs that can be calculated from predicted tissue concentrations and the empirical sediment data appear to be reasonable and within the range of measured BSAFs at both Portland Harbor and at other sites. This is a good check on the operation and predictive ability of the FWM.

LWG Response: The comments and recommendations on BSAF development are useful and will help us tailor the BSAF analysis and presentation to better address EPA's interests. The next bioaccumulation modeling report will include detailed responses explaining how we addressed the specific comments on biota-sediment relationship development.